

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GAYLE REED,)	
)	
Plaintiff,)	
)	Civil Action 07 C 6734
v.)	
)	
TRAN UNION, LLC)	Judge William J. Hibbler
and FIRST AMERICAN CREDCO, INC.)	
)	
Defendants.)	Magistrate Judge Maria Valdez

**AGREED MOTION FOR EXTENSION OF TIME TO ANSWER, MOVE,
OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant First Advantage Credco, LLC (misidentified in the Complaint at First American Credco, Inc.) ("Credco"), by and through W. Kent Carter and Adam C. Toosley of Clark Hill PLC, hereby moves this Court, under Fed. R. Civ. P. 6(b), for an extension of time to answer, move, or otherwise respond to Plaintiff's Complaint, and in support thereof states as follows:

1. Pursuant to service of summons, Credco is required to answer, move, or otherwise respond to Plaintiff's Complaint by December 20, 2007.
2. Credco's counsel received notice of the Complaint on December 13, 2007.
3. On December 14, 2007, counsel for Plaintiff agreed to the proposed extension.
4. Credco's request for an extension of time to answer, move, or otherwise respond is not brought for purposes of needlessly delaying the proceedings and will not prejudice any party.

5. The allegations in the Complaint against Credco relate to disputes that Plaintiff alleges it sent to co-defendant Trans Union concerning consumer credit information in Plaintiff's credit report.

4. Credco is in the process of gathering information regarding Plaintiff's allegations so that it can more fully address the allegations in the Complaint.

5. Accordingly, Credco respectfully requests that this Court extend its time to answer or otherwise plead to and including January 25, 2008.

WHEREFORE, Credco respectfully requests that this Court grant its motion for an extension of time and that the time by which it is required to answer, move, or otherwise respond to Plaintiff's Complaint be extended to and including January 25, 2008.

Respectfully submitted,

/s Adam C. Toosley

Dated: December 17, 2007

W. Kent Carter, Esq.
Adam C. Toosley, Esq.
Clark Hill PLC
150 N. Michigan Ave., Suite 2400
Chicago, IL 60601
Tel: (312) 985-5900
Fax: (312) 985-5999